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IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI FIRST JUDICIAL DISTRICT

SHANNON EASTER

PLAINTIFF

VERSUS

CIVIL ACTION NO.: 20-187

JACKSON STATE UNIVERSITY

DEFENDANT

JURY TRIAL DEMANDED

COMPLAINT

This is an action to recover actual and punitive damages for discrimination in violation of the Title VII of the Civil Rights Act of 1964 and sex discrimination. The following facts support the action:

1.

Plaintiff, Shannon Easter, is an adult resident citizen of Madison County, Mississippi who may be contacted through undersigned Counsel.

2.

Defendant, Jackson State University is a Mississippi University organized under the laws of the State of Mississippi who may be served with process through the Attorney General at 550 High Street, Jackson Mississippi 39201.

3.

This court has concurrent jurisdiction under 28 U.S.C. § 1331 and civil rights jurisdiction under 28 § 1343, for a cause of action arising under the Title VII of the Civil Rights Act of 1964,

EXHIBIT A

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as amended by the Civil Rights Act of 1991. Venue is proper, because Defendant's employed in Plaintiff in Jackson, Mississippi.

4.

Plaintiff has filed an EEOC charge attached hereto as Exhibit "A" and has received a Right-to-Sue letter attached hereto as Exhibit "B".

5.

Plaintiff was employed by the Defendant and did an excellent job.

6

While working for the Defendant, Plaintiff first complained about being sexually harassed in October of 2014 by a male co-worker, Doug Stringfellow. Plaintiff complained to human resources and her department head, but the situation never changed.

7.

In March/April of 2018 Plaintiff began to complain again about being sexually harassed because her harasser was moved into an office right next to her and the harassment got worse. Plaintiff told human resources and her supervisor that Plaintiff wanted to speak to the EEOC office on campus, and shortly thereafter she was terminated, even though Plaintiff had an excellent work evaluation history. The only reason for Plaintiff's termination was her complaints of sexual harassment.

8.

Plaintiff reached out to human resources in hopes that her job could be saved, and the harassment ended, but the Defendant simply brushed the issues aside and retaliated against the Plaintiff.

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The actions and omissions of the Defendant, as complained of herein, created and fostered a hostile work environment because of Plaintiff's sex in violation of Title VII. In addition, Defendants have conspired to deprive Plaintiff of her rights and employment, inflicting emotional distress upon Plaintiff, because Plaintiff is a woman, in violation of 42 U.S.C. § 1981 and the 14th Amendment.

10.

The acts and omissions of the Defendant was in violation of Title VII. Plaintiff lost her employment because the Defendant took no action on any complaints related to the male coworker. Plaintiff was discharged for complaining about sexual harassment.

11.

Plaintiff is entitled to actual damages for mental anxiety and stress and lost income.

Defendant's actions are outrageous such that punitive damages are due. Plaintiff seeks damages for lost income, and mental stress and anxiety against the Defendants for:

A. Sex discrimination and Sexual harassment under Title VII and 42 U.S.C. 1981

PRAYER FOR RELIEF

Plaintiff prays for actual, compensatory, special, and punitive damages in the amount to be determined by a jury, reinstatement and for reasonable attorney's fees.

THIS the day of March, 2020.

Respectfully submitted,

SHANNON EASTER,

DANIEL M. WAIDE, M8B #103543

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Daniel M Waide, MS Bar #103543 Johnson, Ratliff & Waide, PLLC 1300 Hardy Street Hattiesburg, MS 39401 T: (601) 582-4553

F: (601) 582-4556 dwaide@jhrlaw.net Case 3:20-cv-00366-DPJ-FKB Document 1-1 Filed 05/28/20 Page 5 of 8

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		and EEO		
	Agency, if any			
Name (indicate Mr. Ms. Mrs.)		Home Phone (Incl. Area Code)		
Shannon Easter		662-607-1631 XXXXXXXX		
	and ZIP Code			
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Name	No. Employees, Members			
Jackson State University	15+	601-979-2	121	
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1400 John R. Lynch Street, Jackson, MS 39217				
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my complaints of sexual harassment. I want this charge filed with both the EEOC and the State or local A if any. I will advise the agencies if I change my address or phone n and I will cooperate fully with them in the processing of my charge i accordance with their procedures.	gency, NOTARY – When Requirements	Adamana	t on my gender and	

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CERTIFIED MAIL 7018 1830 0000 1244 7686 U.S. Department of Justice
Civil Rights Division
NOTICE OF RIGHT TO SUE WITHIN 90 DAYS

950 Pennsylvania Avenue, N.W. Karen Ferguson, EMP, PHB, Room 4701 Washington, DC 20530

December 18, 2019

Ms. Shannon L. Easter c/o Daniel M. Waide, Esquire Attorney at Law Great Southern National Bank 1300 Hardy Street, 2nd Floor Hattiesburg, MS 39401

Re: EEOC Charge Against Jackson State University No. 423201802508

Dear Ms. Easter:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

The investigative file pertaining to your case is located in the EEOC Jackson Area Office, Jackson, MS.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

Eric S. Dreiband
Assistant Attorney General
Civil Rights Division

Karen L. Ferguson

Supervisory Civil Rights Analyst Employment Litigation Section

cc: Jackson Area Office, EEOC Jackson State University



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Document #: 2-1 Filed: 03/20/2020 Case: 25CI1:20-cy-00182-TTG Court Identification Case Year Docket Number **COVER SHEET Docket Number** Civil Case Filing Form (To be completed by Attorney/Party Judicial Court ID District (CH, CI, CO) Prior to Filing of Pleading) Local Docket ID 2020 Mississippi Supreme Court Form AOC/01 Date Administrative Office of Courts (Revised 1/1/2001) Case Number if filed prior to 1/1/94 This area to be completed by clerk IN THE CIRCUIT COURT OF HINDS COUNTY Short Style of Case: Shannon Easter v. Jackson State University MS Bar No. 103543 Check (✓) if Not an Attorney Check (J) if Pro Hac Vice Signature Compensatory Damages Sought: \$ Punitive Damages Sought: \$ If "yes" is checked, please submit a completed Child Support Is Child Support contemplated as an issue in this suit? Yes Information Sheet with Final Decree/Judgment PLAINTIFF - PARTY(IES) INITIALLY BRINGING SUIT SHOULD BE ENTERED FIRST (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL PLAINTIFFS ON SEPARATE FORM Individual Easter Shannon A. First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV Address of Plaintiff Check (/) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of Check (//) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: Business Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated Check (I) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: DEFENDANT - NAME OF DEFENDANT (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL DEFENDANTS ON SEPARATE FORM First Name Maiden Name, if Applicable Middle Init. Last Name Jr/Sr/III/IV Check (/) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of . Check (/) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A / Agency . Business Jackson State University Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated Check (</) if Business Defendant is being sued in the name of an entity other than the above, and enter below: D/R/A Bar No. ATTORNEY FOR THIS DEFENDANT: Name: Pro Hac Vice (1) in left hand column, check one (1) box that best describes Probate Children and Minors - Non-Domestic Accounting (Probate) Adoption - Noncontested the nature of this suit. In right hand column check all Birth Certificate Correction Consent to Abortion for Minor boxes which Indicate secondary claims. Remov Other Commitment Removal of Minority Business/Commercial Conservatorship Accounting (Business) Guardianship Torts-Personal Injury Bankruptcy Business Dissolution Business Dissolution Debt Collection
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Examination of Debtor Heirship Bad Faith Business Dissolution - Corporation Intestate Estate Fraud Business Dissolution - Partnership Minor's Settlement Loss of Consortium Muniment of Title Malpractice - Legal Name Change Malpractice - Medical Power of Attorney Negligence - General Execution Testate Estate Negligence - Motor Vehicle Foreign Judgment Will Contest **Products Liability** Garnishment Other Wrongful Death Pension Other Statutes/Rules Receivers Replevin Receivership **Bond Validation Mass Tort** Civil Forfeiture Asbestos Stockholder Suit **Declaratory Judgment** Chemical Spill Other ERISA Dioxin **Domestic Relations Eminent Domain** Hand/Arm Vibration Child Custody/Visitation Child Support
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IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI FIRST JUDICIAL DISTRICT

SHANNON EASTER PLAINTIFF

V. CIVIL ACTION NO.: 20-127

JACKSON STATE UNIVERSITY

DEFENDANT

SUMMONS

THE STATE OF MISSISSIPPI COUNTY OF HINDS

TO: Jackson State University c/o Attorney General 550 High Street Jackson, MS 39201

THE COMPLAINT, WHICH IS ATTACHED TO THIS SUMMONS, IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand deliver a copy of a written response to the Complaint to <u>Daniel M. Waide</u>, P.O. Box 17738, Hattiesburg, MS 30404, attorney for the Plaintiffs. Your response to the Complaint must be mailed or delivered within 30 days from the date of delivery of this Summons and Complaint or a judgment by default will be entered against you for the money or other things demanded in the Complaint. You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and seal of said Court, this **40** day of March, 2020.

Zack Wallace,
HINDS COUNTY CIRCUIT CLERK

Daniel M. Waide, (MSB#1011000 HARDY ST.

PO Box 17738

HATTIESBURG, MS 39404

601-582-4553 (OFFICE)

601-582-4556 (FAX)

dwaide@jhrlaw.net